

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS DAVID WILLIAMS  
TO PUBLIC REPRESENTATIVE INTERROGATORIES  
(PR/USPS-T1-1 THROUGH 4)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the Public Representative dated January 31, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO PUBLIC REPRESENTATIVE INTERROGATORY**

**PR/USPS-T1-1**

On page 9 of your testimony you state, "The Postal Service is planning to implement a fundamental realignment of the mail processing network to utilize capital assets and personnel more efficiently over the long-run, while also meeting its obligation to provide regular and effective levels of mail service."

- a. Do service performance results measure the attainment of effective mail service? If so, how?
- b. How will service performance results be used to gauge the level of effective mail service after the proposed changes are implemented?
- c. Will service performance targets be amended to reflect the proposed changes? If so, how?

**RESPONSE**

- a. Service performance results measure whether mail has been delivered by the service standard defined for each OZIP-DZIP pair.
- b. Service performance results will continue to be utilized to measure how well the Postal Service achieves its service standards as they are utilized today. See the response to NPPC/USPS-T1-1.
- c. Establishment of future performance targets will take into consideration the service standards in effect at the time or projected to be in effect. Senior management will review standards and consult with the Governors in establishing targets.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO PUBLIC REPRESENTATIVE INTERROGATORY**

**PR/USPS-T1-2**

On page 9 of your testimony you state, "...the most significant service changes are in the narrowing of the scope of the overnight and two-day First-Class Mail service standards." The recent service performance results show that the Postal Service exceeded service performance targets only for First-Class overnight and two-day.

- a. Will the proposed changes impact First-Class Mail overnight and two-day annual service performance results? If so, how?
- b. Will the proposed changes impact Periodicals overnight and two-day annual performance results? If so, how?

**RESPONSE**

a-b. It is currently unknown what the service performance results will be. The Postal Service is planning the network to meet the service standards proposed. The Postal Service acknowledges that some mail currently is not, and in the future will not be, delivered in time to meet applicable service standards. However, assuming implementation of the proposed service standard changes, the Postal Service has no method or basis for predicting the percentage of mail that, in the future network still being determined, would be not be delivered by the assigned service standard because of a service failure.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**PR/USPS-T1-3**

On page 21 of your testimony you explain that “the modifications to the 2-day service standard business rules will have the effect of expanding the number of 3-digit origin-destination ZIP Code pairs with a 3-day service standard.” How will this expansion affect service performance results for First-Class Mail and Periodical three-to-five day?

**RESPONSE**

It is currently unknown what the service performance results will be. The Postal Service is planning the network to meet the service standards proposed. The Postal Service acknowledges that some mail currently is not, and in the future will not be, delivered in time to meet applicable service standards. However, assuming implementation of the proposed service standard changes, the Postal Service has no method or basis for predicting the percentage of mail that, in the future network still being determined, would be not be delivered by the assigned service standard because of a service failure.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO PUBLIC REPRESENTATIVE INTERROGATORY**

**PR/USPS-T1-4**

Please explain how the proposed changes will affect scanning procedures for First-Class Mail using IMb.

**RESPONSE**

No changes in First-Class Mail IMb scanning procedures are anticipated.